

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

In re:

CUSTOMS AND TAX ADMINISTRATION
OF THE KINGDOM OF DENMARK
(SKATTEFORVALTNINGEN) TAX
REFUND LITIGATION

This document relates to:

18-cv-09840 and 18-cv-09841

MASTER DOCKET

Case No. 1:18-md-02865-LAK

**NOTICE OF MOTION *IN LIMINE* TO EXCLUDE THE PROPOSED EXPERT
REPORTS, OPINIONS AND TESTIMONY OF GRAHAM WADE**

PLEASE TAKE NOTICE that, upon the Declaration of Brandon R. Dillman dated June 6, 2022 and all exhibits thereto, the accompanying Memorandum of Law dated June 6, 2022, any reply papers filed in support, and all prior pleadings and proceedings herein, the defendants in the ED&F Bellwether Actions¹ (American Investment Group of New York, L.P. Pension Plan; Riverside Associates Defined Benefit Plan; Acer Investment Group, LLC; Robert Crema; Stacey Kaminer; and David Schulman) and third-party defendant ED&F Man Capital Markets, Ltd., by their undersigned attorneys, will move this Court, before the Honorable Lewis A. Kaplan, at the Daniel Patrick Moynihan United States Courthouse, 500 Pearl Street, New York, New York, Courtroom 21B, at a date and time to be determined by the Court, for an order pursuant to Rules 403 and 702 of the Federal Rules of Evidence, excluding the proposed expert reports, opinions

¹ The ED&F Bellwether Actions are *Skatteforvaltningen v. Riverside Assocs. Defined Benefit Plan, et al.*, Case No. 1:18-cv-09840-LAK (S.D.N.Y.) and *Skatteforvaltningen v. Am. Inv. Grp. of N.Y., L.P. Pension Plan et al.*, Case No. 1:18-cv-09841-LAK (S.D.N.Y.).

and testimony of Graham Wade, and for such other and further relief as the Court deems just and proper.

Dated: June 6, 2022

Respectfully submitted,

/s/ John C. Blessington

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